

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA,

*ex rel.* ALEX DOE, Relator,

THE STATE OF TEXAS,

*ex rel.* ALEX DOE, Relator,

THE STATE OF LOUISIANA,

*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF  
COAST, INC., PLANNED  
PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED  
PLANNED PARENTHOOD SOUTH  
TEXAS, INC., PLANNED  
PARENTHOOD CAMERON  
COUNTY, INC., PLANNED  
PARENTHOOD SAN ANTONIO,  
INC.,

Defendants.

Civil Action No. 2:21-CV-00022-Z

**RELATOR'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO DEFENDANTS' MOTIONS TO DISMISS**

Relator Alex Doe respectfully moves this Court for a four-day extension of time, until and including March 11, 2022, to file Relator's Responses to Defendants' Motions to Dismiss. In support thereof, Relator states as follows:

1. On February 14, 2021, Defendants filed a motion to dismiss Relator's complaint, a motion to dismiss Defendant PPFA for improper service, and a motion to dismiss Defendant PPGT for improper service. Pursuant to Local Rule 7, Relator's responses to these motions are due on March 7, 2022.

2. Since Defendants' motions were filed, Relator's counsel has had to respond to an emergency stay motion at the Fifth Circuit in another case in this District and has three briefs due this week in that case.

3. From March 2 through March 5, 2022, undersigned counsel will be in California to attend funeral and burial services for her grandfather, who recently passed away.

4. Because of the above unforeseen professional and family commitments, undersigned counsel requests a brief extension of time for the responses to the above-mentioned motions. The purpose of the extension is not for delay, but to allow counsel to provide helpful briefing to the Court.

5. On February 28, 2022 and March 1, 2022, Relator's counsel conferred with counsel for Texas and with Defendants' counsel regarding this motion. Both Texas and Defendants are unopposed to the extension.

## CONCLUSION

For the foregoing reasons, Relator respectfully requests a four-day extension of time, up to and including March 11, 2022, to file Relator's Responses to Defendants' Motions to Dismiss.

Respectfully submitted.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker  
Texas Bar No. 24103325  
Andrew B. Stephens  
Texas Bar No. 24079396  
HACKER STEPHENS LLP  
108 Wild Basin Road South, Suite 250  
Austin, Texas 78746  
(512) 399-3022  
heather@hackerstephens.com  
andrew@hackerstephens.com

**Attorneys For Relator**

**CERTIFICATE OF CONFERENCE**

On February 28, 2022 and March 1, 2022, counsel for Relator conferred with counsel for Texas and counsel for Defendants regarding the relief requested in this motion. Texas and Defendants are unopposed.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker

**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2022, I electronically filed the foregoing document through the Court's ECF system, which automatically notifies counsel of record for each party.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker